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11 UNITED STATES DISTRICT COURT
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13 NORTHERN DISTRICT OF CALIFORNIA
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15 OAKLAND DIVISION

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17 UNITED STATES OF AMERICA,) CASE NO. CR 14-0021 JST
18 Plaintiff,)
19 v.) STIPULATION TO RESCHEDULE CHANGE OF
20 CHARLES S. MOORE,) PLEA HEARING AND TO EXCLUDE TIME
21 Defendant.) UNDER SPEEDY TRIAL ACT AND ~~PROPOSED~~
22) ORDER THEREON
23)
24)
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For the reason that Defendant Charles S. Moore needs additional time for effective preparation, continuity of counsel, trial preparation, and to consider the government's proposed plea agreement, the United States of America, and Defendant, through their respective counsel, hereby stipulate as follows:

1. That the change of plea hearing in this matter be rescheduled from January 2, 2015, to January 16, 2015, at 9:30 a.m., to allow Defendant sufficient time to prepare this matter for trial and to consider the proposed plea agreement.

2. That the period of delay from January 2, 2015, to January 16, 2015, be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends for justice served by this exclusion allow for effective preparation, continuity of counsel and adequate trial preparation, which outweigh the best interests of the public and Defendant in a speedy trial.

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1 Respectfully submitted,

2 MELINDA HAAG
3 United States Attorney

4 /s/
5 JOYCE LEAVITT
6 Assistant Public Defender

7 /s/
8 THOMAS MOORE
9 Assistant United States Attorney
10 Chief, Tax Division

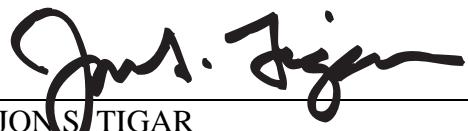
11 ORDER

12 For the reasons stated by the parties in their stipulation, the Court finds that the ends of justice are
13 served by continuing the change of plea hearing to allow Defendant additional time for effective
14 preparation, continuity of counsel, trial preparation, and to consider the proposed plea agreement. The
15 Court also finds that the period of delay from January 2, 2015, to January 16, 2015, be excluded in
16 accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§3161(h)(7)(A) and (h)(7)(B)(iv), as
17 the ends for justice served by this exclusion allow for effective preparation, continuity of counsel and
18 adequate trial preparation, which outweigh the best interests of the public and Defendant in a speedy
19 trial.

20 IT IS HEREBY ORDERED that the change of plea hearing scheduled for January 2, 2015, be
21 rescheduled to January 16, 2015, at 9:30 a.m. and that the period of delay from January 2, 2015, through
22 January 16, 2015, shall be excluded in accordance with the provisions of the Speedy Trial Act, 18
23 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends of justice served by this continuance allow for
24 effective preparation, continuity of counsel, and adequate preparation, which outweigh the best interests
25 of the public and Defendant in a speedy trial.

26 IT IS SO ORDERED this 31st day of December, 2014.

27 Dated: December 31, 2014

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29 JON S. TIGAR
30 UNITED STATES DISTRICT JUDGE